

# EXHIBIT B

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

STEVEN CABRAL

Plaintiff

v.

STONE CONTAINER CORPORATION  
Defendant

C.A. No. 04-CV-11961 MEL

AFFIDAVIT OF WILLIAM NOBLE


I WILLIAM NOBLE, depose and state as follows:

1. I am Underwriting Manager of LANCER INSURANCE COMPANY (hereinafter "LANCER"), a proposed defendant in the above-captioned matter, and as such, am fully familiar with all of the facts, circumstances and proceedings involving the policy of insurance which is the subject of this action.
2. I have reviewed the insurance policy TP606266, including the Truckers Declaration, as well as all pertinent documents related to Lancer's policy or policies with System Freight, Inc., and I am unaware of any documents that list Smurfit Corporation and/or Stone Container Corporation as

an insured or an additional insured for the date  
of the alleged subject loss, August 20, 2001.

Signed under the pains and penalties of perjury.

Date: 11.2.04

  
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William Noble